

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

SHANNON SPENCER, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

PROVIDENCE ST. JOSEPH HEALTH  
FOUNDATION, a Washington nonprofit  
corporation doing business as PROVIDENCE;  
and DOES 1-20,

Defendant.

No. 2:23-cv-01723-BJR

**STIPULATED MOTION FOR  
EXTENSION OF TIME AND ORDER**

**STIPULATION**

Plaintiff, Shannon Spencer (“Plaintiff”), and Defendant, Providence St. Joseph Health Foundation (“Defendant”) (collectively, the “Parties”), by and through their respective undersigned attorneys, respectfully submit this Stipulated Motion for Extension of Time of the following deadlines.

Pursuant to Federal Rule of Civil Procedure 6(b), the Parties jointly request as follows:

1. For Plaintiff’s deadline to bring a Motion to Remand:

a. To extend the deadline for filing a Motion to Remand to May 1, 2024.

2. For the FRCP 26(f) conference and initial disclosures:

STIPULATED MOTION FOR EXTENSION OF TIME  
AND ORDER - 1

Case No. 2:23-cv-01723-BJR

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a. To set the FRCP 26(f) conference deadline to May 15, 2024; and

b. To set the initial disclosure deadline to May 22, 2024.

The Parties are discussing alternative resolution and have scheduled a mediation for April 17, 2024 to assist in facilitating a potential settlement. Parties respectfully request this extension to provide them with the requisite time to prepare to meet the deadlines if this matter is not resolved during mediation.

DATED: January 19, 2024

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By: /s/ Patrick B. Reddy

By: /s/ Paul Cipriani

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*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 19, 2024, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

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*Attorney for Defendant*

s/ Jennifer Chong  
Jennifer Chong, Legal Assistant

**ORDER**

Upon consideration of the Parties' Stipulated Motion for Extension, the Court finds that good cause exists to extend certain deadlines, and it is hereby **ORDERED** that the Motion is **GRANTED**.

It is **FURTHER ORDERED** that filing deadlines will be modified as follows.

Event	Current Date	New Date
Motion to Remand	January 19, 2024	May 1, 2024
FRCP 26(f) Conference	February 2, 2024	May 15, 2024
Initial Disclosure Deadline	February 8, 2024	May 22, 2024
Joint Status Report	February 15, 2024	May 29, 2024

DATED this 22nd day of January, 2024.



Barbara J. Rothstein  
United States District Judge